

McDONALD CARANO
 2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA 89102
 PHONE 702.873.4100 • FAX 702.873.9966

Amanda C. Yen (NSBN 9726)
 Kristen T. Gallagher (NSBN 9561)
 McDONALD CARANO LLP
 2300 W. Sahara Ave, Suite 1200
 Las Vegas, NV 89102
 Telephone: 702.873.4100
 ayen@mcdonaldcarano.com
 kgallagher@mcdonaldcarano.com

David P. Shouvin
 PORTER WRIGHT MORRIS & ARTHUR LLP
 41 South High Street, Suite 2900
 Columbus, OH 43215
 Telephone: 614.227.2045
 dshouvin@porterwright.com
 (admitted *pro hac vice*)

Attorneys for Konecranes Global Corporation

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

KONECRANES GLOBAL CORPORATION,

 Plaintiff,

 vs.

 MODE TECH (Beijing) Co., Ltd.,

 Defendant.

Case No.: 2:18-cv-02015-GMN-NJK

**STIPULATION AND ORDER FOR
 MODIFICATION OF BRIEFING
 SCHEDULE AND CLAIM
 CONSTRUCTION HEARING MATTERS
 (ECF NO. 107)**

(Fourth Request)

Pursuant to LR IA 6-1 and LPR 1-3, Plaintiff Konecranes Global Corporation (“Konecranes”) and Defendant Mode Tech (Beijing) Co., Ltd. (“Mode Tech” and together, the “Parties”) agree and respectfully request an additional three-week extension of Claim Construction briefing deadlines and a corresponding continuance of the Patent Tutorial and Claim Construction hearings (currently unscheduled) (ECF Nos. 98, 105, 107), due to renewed settlement discussions along with continued travel-related concerns of counsel for the Parties in connection with the coronavirus (COVID-19) pandemic and related limitations. This is the parties’ fourth request.

Specifically, the Parties’ respective counsel have discussed and agreed to an approximate three-week extension of the Briefing Deadlines to allow the Parties to further

1 explore recent settlement developments as well as to reschedule the deposition of Konecranes’
2 expert Emil Geiger from its current June 26, 2020 date for the same travel-related concerns.¹
3 The Parties have correspondingly stipulated and agreed to extend Mode Tech’s deadline to file
4 its Claim Construction Responsive Brief from July 10, 2020 to July 31, 2020 and Konecranes’
5 deadline to file its Claim Construction Reply Brief from July 17, 2020 to August 7, 2020 (ECF
6 No. 107). Accordingly, the Parties respectfully request that the Court grant this Stipulation and
7 also continue the Patent Tutorial and Claim Construction hearings for approximately three
8 additional weeks to a date convenient to the Court.

9 ...

10 ...

11 ...

12 ...

13 ...

14 ...

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27

28 ¹ Mr. Geiger’s deposition was scheduled to take place in Reno, Nevada.

In accordance with the Court's prior Order (ECF No. 107), the Parties shall jointly file a Notice with the Court upon completion of briefing on August 10, 2020, identifying three proposed dates for the Patent Tutorial and Claim Construction hearings for the Court's consideration and further coordination.

DATED this 22nd day of June, 2020.

McDONALD CARANO LLP

BUETHER JOE & CARPENTER, LLC

By: /s/ Kristen T. Gallagher
 Amanda C. Yen (NSBN 9726)
 Kristen T. Gallagher (NSBN 9561)
 2300 W. Sahara Avenue, Suite 1200
 Las Vegas, NV 89102
 Telephone: 702.873.4100
 ayen@mcdonaldcarano.com
 kgallagher@mcdonaldcarano.com

David P. Shouvin
 PORTER WRIGHT MORRIS &
 ARTHUR LLP
 41 South High Street, Suite 2900
 Columbus, OH 43215
 Telephone: 614.227.2045
 dshouvin@porterwright.com
 (admitted *pro hac vice*)

*Attorneys for Konecranes Global
 Corporation*

By: /s/ Nicholas C. Kliewer
 Christopher M. Joe
 Kenneth P. Kula
 Brian A. Carpenter
 Nicholas C. Kliewer
 1700 Pacific, Suite 4750
 Dallas, TX 75201
 Telephone: (214) 466-1272
 chris.joe@bjciplaw.com
 ken.kula@bjciplaw.com
 brian.carpenter@bjciplaw.com
 nick.kliewer@bjciplaw.com
 (admitted *pro hac vice*)

Daniel T. Foley, Esq.
 Nevada Bar No. 1078
 1210 S. Valley View Blvd. #208
 Las Vegas, NV 89102
 Telephone: (702) 384-2070
 dan@foleyoakes.com

*Attorneys for Mode Tech (Beijing) Co.,
 Ltd.*

IT IS SO ORDERED.

Dated this 25 day of June, 2020.


 Gloria M. Navarro, District Judge
 UNITED STATES DISTRICT COURT